

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a  
OCEAN POINT TERMINALS, PORT  
HAMILTON REFINING AND  
TRANSPORTATION, and WEST  
INDIES PETROLEUM, LTD.,

Defendants.

Case No. 1:23-CV-00012

**ACTION FOR DAMAGES**

JURY TRIAL DEMANDED

**NOTICE OF DEPOSITION OF CATHERINE ELIZEE**

TO:

Glenda L. Lake, Clerk of the Court  
District Court of the V.I.

Donnie King  
201 East Las Olas Boulevard, Suite 1800  
Fort Lauderdale, FL 33301  
Reginald E. Janvier, Esq.  
201 East Los Olas Boulevard, Suite 1800  
Fort Lauderdale, FL 33301  
Attorney for Limetree Bay Terminals, LLC d/b/a Ocean Point Terminals

Andrew C. Simpson  
2191 Church Street, Suite 5  
Christiansted, VI 00820  
Attorney for Port Hamilton Refining and Transportation Port Hamilton  
Refining and Transportation

Ryan C. Stutzman Esq.  
1138 King Street  
Suite 100  
Christiansted, VI 00820  
Attorney for West Indies Petroleum, Ltd.



Wooten, Nicole v. Limetree Bay Terminals, et. al., Case No. 1:23-CV-00012

**NOTICE OF DEPOSITION OF FERMIN RODRIQUEZ**

Page 2

Susan Nissman-Coursey  
Caribbean Scribes, Inc.  
1244 Queen Cross Street, Suite 1A  
Christiansted, VI 00820

**PLEASE TAKE NOTICE** that pursuant to Federal Rules of Civil Procedure 26, 30 and 32 Plaintiff, by and through undersigned counsel, will take the oral examination of **CATHERINE ELIZEE** on **April 11, 2025 at 9:00 a.m. AST** at **Lee J. Rohn and Associates 1108 King Street Christiansted VI 00820** before any Notary Public commissioned by the Territory of the US Virgin Islands or other person qualified to administer the oath and take deposition.

This deposition is being taken for use as evidence and/or trial purposes and may be continued from day to day until completed. This deposition may be recorded by stenographic, voice, and/or audio/video means. If the deposition officer is attending remotely, the parties agree to the remote administration of the oath.

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiff

DATED: March 26, 2025

BY: /s/ Robin P. Seila

Robin P. Seila, Esq.  
VI Bar No. R2043  
1108 King Street, Suite 3 (mailing)  
56 King Street, Third Floor (physical)  
Christiansted, St. Croix  
U.S. Virgin Islands 00820  
Telephone: (340) 778-8855  
robin@rohnlaw.com

**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on March 26, 2025, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

All counsel of record.

*/s/Robin P. Seila*